United States Department of Agriculture
Food Safety And Inspection Service
Technical Service Center
Suite 300, Landmark Center
1299 Farnam Street
Omaha. NE 68102

AUDIT REPORT FOR AUSTRALIA

FEBRUARY 27 THROUGH MARCH 28, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Australia's meat inspection system from February 27 through March 28, 2002. Thirteen of the 101 establishments certified to export meat to the United States were audited. Twelve of these were slaughter establishments; the other one was conducting processing operations. Included in this group were two establishments that slaughter ratites.

The last audit of the Australian meat inspection system was conducted in August 2001. Fourteen establishments were audited. The auditor found serious deficiencies in two establishments (Ests. 224 and 716) that were then designated as marginal/re-review at the next audit. Establishment 520, which was part of the records only review group was delisted because of the non-existence of SSOP and HACCP programs. One major concern was reported at that time: HACCP-implementation was deficient in several criteria in two establishments (Ests. 224 and 716), and a few criteria in five of the establishments visited (Ests. 008, 359, 648, 2346 and 3458).

At the time of this audit, Australia was eligible to export fresh and frozen processed beef, lamb, mutton and goat products to the United States.

During calendar year 2001 and the first two months of 2002, Australian establishments exported over 1.1 billion pounds of meat products to the U.S. Port-of-entry (POE) rejections were 2.76 million pounds or 0.25 % of the total import for various defects.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Australian meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities and at other sites. The third was conducted by on-site visits to establishments. The fourth was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella* and generic *Escherichia coli (E. coli).*

Establishments for this audit were randomly selected as a group of 24 drawn from the list of 101 establishments certified by Australia to export to the United States. From that group of 24 establishments, a group of 10 were randomly selected for on-site visits and the balance were designated for records only audits. Added to the on-site list were three ratite slaughter establishments and one establishment for re-review (Est. 224) that was not on the random selected list. The other establishment (Est. 716) slated for re-review was among the randomly selected establishments. In addition one of the establishments (Est. 1980) selected for an on-site audit was not operating on the day of the audit so the audit was converted to a records only audit. These actions resulted in 13 on-site audits and 15 records only audits as the final count. One establishment (Est. 520) deemed unacceptable in last year's audit was not put back on the list so it was not audited this year.

Australia's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in all of the 13 establishments audited. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As previously stated above, one major concern had been identified during the last audit of the Australian meat inspection system conducted in August 2001. Accordingly, HACCP-implementation deficiencies had been found in two of the 14 establishments visited (Ests. 224 and 716) and to a lesser degree in six establishments (Ests. 008, 359, 648, 2346, 3416, and 3458). During this new audit, implementation of the required HACCP programs was again found to be deficient in six establishments (Ests. 558, 3416, 790, 389, 572 and 533). This was a repeat finding. Similar deficiencies were seen in the records only audits of nine establishments (Ests. 007, 656, 2309, 291, 3173, 612, 249, 100, and 1980). Details are provided in the Slaughter/ Processing Controls section later in this report. Another area of

major concern, identified during this new audit, is the recording of preventive action in the SSOP and HACCP program.

Entrance Meeting

On February 27, an entrance meeting was held in the Canberra offices of the Australian Quarantine Inspection Service (AQIS), and was attended by Dr. John Dorian, Program Manager Meat; Dr. Bill Turner, Principal Veterinary Officer; Dr. Steve Tidswell, Area Technical Manager Canberra; Dr. Albert Cobb, Coordinator Verification Unit; Mr. Neville Spencer, Technical Service Unit; Mr. Paul Smith, Meat Technical Database Administrator; Mr. Stephen Richardson, Technical Unit; Ms. Kerren McDonald, Technical Service Unit; Ms. Robyn Finn, Technical Service Unit; Dr. Bill Matthews, Market Maintenance; Mr. Gary Cullen, Market Maintenance; Mr. Randy Zeitner, Agriculture Counsellor U. S. Embassy; and Dr. M. Douglas Parks, International Audit Staff Officer, FSIS, USDA. Topics of discussion included the following:

1. Finalization of the audit itinerary.

2. AQIS response to recent FSIS audits.

3. Urine spillage in sheep slaughter.

4. Inspection of ratite slaughter.

5. Changes in structure of AQIS (new Executive Manager). Proposed verification unit.

Headquarters Audit

There had been some changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of the inspection system in August 2001. A new Executive Manager for Exports, Mr. Greg Read, is now in place and a new proposed Verification Unit is presently in place and is chaired by Dr. Albert Cobb. It is envisioned that this unit will encompass the seven areas of responsibility of AQIS, one of which is meat.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called “the auditor”) observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters, the inspection service, or the district or regional office. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, and HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.
- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

Concerns that arose as a result the examination of these documents are addressed in the body of this report.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Australia as eligible to export meat products to the United States were full-time AQIS employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

One hundred and one establishments were certified to export meat products to the United States at the time this audit was conducted. Thirteen establishments were visited for on-site audits. In all establishments visited, both AQIS inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories; intra-laboratory quality assurance procedures, including sample handling; and methodology.

The Symbio Alliance, a private laboratory in Brisbane, was audited on March 6, 2002. Except as noted below, effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and Print-outs, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done. The check sample program did meet FSIS requirements.

1. Some of the containers of working solutions and mother solutions were not marked with preparation dates and expiration dates.

Australia's microbiological testing for *Salmonella* and *E. coli* was being performed in private laboratories. One of these, the Institute of Medical and Veterinary Science in Adelaide was audited. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and the establishment.

The Freestone Feedlot Tatong at Warwick, Queensland was audited on March 11, 2002. All audit findings were positive with one exception:

1. Grains treated with insecticide were not held under security until the withholding period had passed.

<u>Establishment Operations by Establishment Number</u>

The following operations were being conducted in the 13 establishments:

Beef slaughter and boning - seven establishments (Ests. 154, 194, 224, 239, 558, 716, and 790)
Beef and sheep slaughter and boning – one establishment (Est. 533)
Sheep and goat slaughter and boning – two establishments (Ests. 101 and 572)
Horse, ratite, swine, deer and camel slaughter and boning – one establishment (Est. 3416)
Goat, deer, sheep and ratite slaughter and boning – one establishment (Est. 2346)
Sheep processing only – one establishment (Est. 389)

SANITATION CONTROLS

Based on the on-site audits of establishments, Australia's inspection system had controls in place for basic establishment facilities, condition of facilities and equipment and product protection and handling and establishment sanitation program except as noted below.

- In Establishment 194, the procedure for pre-operative inspection did not stipulate the frequency for the inspection.

- In Establishment 389, there was no written procedure for pre-operative inspection but it was being done.

These deficiencies in the written programs were to be written into the programs as soon as possible.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with some variations. Preventative action was not recorded in seven of the establishments visited (Ests. 194, 558, 101, 154, 2346, 224 and 389) and they were not recorded in 11 of the establishments with records only audits (Est. 007, 847, 7170, 656, 2309, 291, 3173, 249, 234, 100, and 1980).

Cross-Contamination

1. The dropped meat procedure was not properly followed in Est. 194
2. The plastic cover on the dropped meat table, ready for use, had residues at two stations in Est. 558.
3. The cords of wizzard knives of carcass trimmers were touching their boots and could also touch the exposed carcass in Est. 790.
4. An employee wiped condensate from overhead structures without removing open cartons to be used for product located under the condensate in Est. 389.
5. Open boxes of exposed product were in the offal packing room during a floor clean up with a high-pressure hose resulting in aerosol from the floor.
6. The moving visera table was not cleaned adequately between uses in Ests. 558, 224 and 101.
7. Ingesta was found in the buccal cavity of cattle after inspection in Est. 533.
8. Tools for handling edible and inedible product were co-mingled in Est.790.

Product Handling and Storage

During a records only audit it was revealed that mouse infestations in the carton storage building were not handled as per the Standard Operating Procedure (SOP) on file in the rodent control program of Est. 249. This SOP was immediately brought into action and monitored by the responsible ATM to his satisfaction. The establishment voluntarily recalled product in Australia and diverted all of their product in Australia to other markets.

Personnel Hygiene and Practices

1. Employee hand processing equipment was being washed in a hand washing sinks in Ests.101 and 2346.
2. An employee equipment sanitizer was at 79.2° C. when 82° C. is required at the pre-trim station in the boning room.
3. The sheep skinning flanker was backing into the skinned carcass next to his position and touching it with his clothes in Est. 572.
4. The employee that was removing the bung was not sterilizing his knife nor was he using the two knife method resulting in possible contamination.

All of these deficiencies in sanitation, cross contamination and personal hygiene were corrected immediately to the satisfaction of the auditor.

ANIMAL DISEASE CONTROLS

Australia's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

Two southern Queensland properties have been quarantined, during 2001, following the death of 10 head of cattle due to anthrax. These properties with reported cases of anthrax are automatically placed under quarantine, thus ensuring no animals can leave the affected property. Dead animals were carefully disposed of through incineration and vaccination of at-risk livestock prevents the infection from spreading. Anthrax in animals rarely occurs in Australia. When it occurs it is a notifiable disease and the affected property is placed under immediate quarantine with strict animal movement restrictions imposed by the Government. Anthrax is a livestock management issue that confronts producers from time to time during hot summer months. It is not a meat issue, as infected animals do not enter the food chain.

RESIDUE CONTROLS

Australia's National Residue Testing Plan for 2002 was being followed, and was on schedule. The Australian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The Australian inspection system had controls in place to ensure adequate ante-and post-mortem inspection procedures and dispositions, control and disposition of dead, dying, diseased or disabled animals, humane handling and slaughter, processed product controls including ingredients, formulations and packaging materials.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements. There were several establishments with HACCP implementation problems. The most prominent of these was an incomplete hazard analysis in five establishments (Ests. 558, 790, 389, 572 and 533). A similar problem was found in five establishments that had records only audits. These were Establishments 656, 2309, 3173, 100 and 1980. Other problems were as follows:

1. No CCP for zero tolerance in Est. 3416.
2. Corrective actions not adequately described in Est. 533.
3. No pre-shipment review in Est. 3416.

HACCP implementation deficiencies were also observed in records only audits.

1. Incomplete flow diagrams in Ests. 291 and 249.
2. Inadequate documentation of corrective action in Est. 007.
3. No pre-shipment review in Ests. 2309, 291, 3173 and 612.

Any establishment with HACCP implementation deficiencies were issued letters by AQIS giving the establishment 30 days to make necessary corrections.

Testing for Generic *E. coli*

Australia has adopted the FSIS regulatory requirements for *E. coli* testing in cattle but not in sheep and goats. Australia has requested an equivalence determination from FSIS regarding the generic *E. coli* testing requirements for sheep and goats.

Twelve of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

There were some problems with the written procedures for *E. coli* testing as follows:

1. The procedure did not designate the employee responsible for sampling in Ests 558, 2346 and 572. This same deficiency was noted during records only audits in Ests. 007, 7170, 656, 2309, 291, 3173, 612, and 1980.

2. The procedure did not designate the establishment location for sample collecting in Ests.194, 239, 154, 2346, 716, and 790. Similarly this deficiency was found in records only audits of Ests. 656, 7170, 291, 3173, 249, 234 and 1980.

These deficiencies in the written programs were to be written into the programs as soon as possible.

Additionally, establishments had adequate controls in place to prevent meat products intended for Australian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The AQIS inspection system controls [control of restricted product and inspection samples, boneless meat re-inspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Eleven of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Australia has adopted the FSIS regulatory requirements for *Salmonella* testing for cattle. There are no FSIS requirements for testing *Salmonella* in sheep and goats. Australia is not testing for *Salmonella* in ratites.

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

Species Verification Testing

At the time of this audit, Australia was not exempt from the species verification testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

These reviews were being performed by the Australian equivalent of Area Supervisors. They are titled Area Technical Managers (ATM) and they review each export facility every month. All were veterinarians with several years of experience.

The internal review program was not applied equally to both export and non-export establishments. Establishments for domestic production are not always reviewed monthly by ATMs. Internal review visits were not always announced in advance and were conducted, at times by individuals and at other times by a team of reviewers, at least once monthly, and sometimes two or three times within a month. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central AQIS offices in Canberra, and were routinely maintained on file for a minimum of three years.

In the event that an establishment is found, during AQIS monthly reviews to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility and be reinstated, the establishment operator draws up a Corrective Action Plan (CAP) addressing necessary corrective and preventive action. The CAP is then desk audited, followed by an on-site compliance audit conducted by AQIS On Plant Veterinary Officer and the AQIS Area Technical Manager. An in-depth group review is then carried out with the lead auditor being a representative of the AQIS Verification Unit.

Enforcement Activities

The following information was obtained from AQIS Compliance and Investigation. AQIS Compliance and Investigation seeks to warrant the integrity of AQIS export and quarantine systems by delivering an investigation and monitoring service designed to encourage industry compliance with the legislative requirements for the movement of product into or out of Australia. The following statistics deal with the meat related issues during January 2001 through February 2002.

Founded prosecutions for meat related issues—0

Prosecutions pending—1
This concerns a forgery of AQIS certification concerning exports to Asia.

Letters of warning—3
These letters relate to security breaches following urgent maintenance at export establishments and a minor problem with official mark regulations. These were resolved by consultation.

Meat matters referred to other agencies—14
These matters deal with breaches of State legislation, Police, and animal welfare issues and most were handled by State Departments.

Meat related incidents discussed with management—31
Various matters included procedure/operations breaches, security breaches, export certification issues, obstruction of authorized officers, entry of ineligible product into the export chain, breaches of approved programs, incorrect trade descriptions and regulations relating to official marks. In these cases, no evidence of criminal intent was identified.

Exit Meeting

An exit meeting was conducted in Canberra on March 28, 2002. The Australian participants were Ms. Meryl Stanton, AQIS Executive Director; Mr. Greg Read, AQIS Executive Manager Exports; Dr. John Dorian, AQIS Meat Inspection Manager; Dr. Albert Cobb, Program Verification Unit; Dr. Stephen Tidswell, AQIS ATM Canberra; Dr. John Langbridge, Senior ATM Queensland; Dr. Roger Turner, Senior ATM NSW; Dr. Charles Bosgra, Senior ATM Melbourne; Dr. Peter McGregor, ATM Sydney; Dr. Kiran Johar, Veterinary Officer Meat Program; Dr. Peter Miller, National Residue Scheme (NRS); Ms Christine Coulson, NRS Animal Programs; Dr. Ann McDonald, General Manager Market Maintenance; Dr. Don Leelawardana, Market Maintenance; Dr. Bill Mathews, PVO Market Maintenance; Mr. Neville Spencer, Technical Services Unit; Mr. Stephen Richardson, Technical Services Unit, Ms. Kerren McDonald, Technical Services Unit; Ms. Robyn Finn, Technical Services Unit; Mr. Russ Smith, AQIS Compliance; Mr. Barry Shirley, AQIS Compliance; Mr. Paul Smith, Meatech Database and Dr. M. Douglas Parks, International Audit Staff Officer, FSIS, USDA. The following topics were discussed:

1. Pre-shipment reviews were discussed and officials said that they going to issue an AQIS Notice to clarify the U.S. requirements.
2. Zero tolerance CCPs, also an AQIS Notice would be issued to make known U.S. standards.
3. Operational sanitation requirements would be consolidated into a single place in the SSOP programs of establishments.

4. Meat Hygiene Assessment (MHA), an AQIS Notice will be issued to make sure all establishments have the same interpretations, There are several different ideas on this plan presently.
5. Discussion of labeling requirements for “natural” or “organic” claims.
6. All of the lymph glands of beef heads are not being incised in Tasmania due to AQIS evaluation of TB free status in that state. They have no record of FSIS permission to stop this procedure.
7. Preventive action not being recorded in SSOP and HACCP was discussed and AQIS will issue a Notice to make sure all establishments understand these requirements.
8. A discussion of “30 day letters” and delistment policies ensued to help them understand the new procedures.
9. Urine spillage was discussed and noted that good progress has been made since this issue was first raised two years ago.
10. Incomplete hazard analysis data charts were noted in many establishments and AQIS Officials said that this requirement would be conveyed to all establishments.
11. There was a commitment from AQIS Officials to put all of these issues into their monthly audits of export establishments and make sure that they are corrected.

CONCLUSION

The inspection system of Australia was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Major concerns found and discussed and as reported earlier in this report are: HACCP implementation deficiencies; preventive action not recorded in SSOP and HACCP programs; various cross contamination findings and some personal hygiene deficiencies. Thirteen establishments were audited and all were left on the U. S. export eligibility list. The deficiencies encountered during the on-site establishment audits and records only audits were adequately addressed to the auditor’s satisfaction.

Dr. M. Douglas Parks (signed) *Dr. M. Douglas Parks*
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
194	√	√	√	√	no	√	√	√
558	√	√	√	√	√	√	√	√
3416	√	√	√	√	√	√	√	√
101	√	√	√	√	√	√	√	√
239	√	√	√	√	√	√	√	√
154	√	√	√	√	√	√	√	√
2346	√	√	√	√	√	√	√	√
716	√	√	√	√	√	√	√	√
790	√	√	√	√	√	√	√	√
224	√	√	√	√	√	√	√	√
389	√	no	√	√	√	√	√	√
572	√	√	√	√	√	√	√	√
533	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

235	√	√	√	√	√	√	√	√
007	√	√	√	√	√	√	√	√
203	√	√	√	√	√	no	√	√
847	√	√	√	√	√	√	√	√
654	√	√	√	√	√	√	√	√
7170	√	√	√	√	√	√	√	no
656	√	√	√	√	√	√	√	√
2309	√	√	√	√	√	√	√	√
291	√	√	√	√	√	√	√	√
3173	no	√	√	√	√	√	√	√
612	√	√	√	√	√	√	√	√
249	√	√	√	√	√	√	√	√
234	√	√	√	√	√	√	√	√
100	√	√	√	√	√	√	√	√
1980	√	√	√	√	√	√	√	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. (except Est. 12, which was a cold-storage facility) was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conduct-ed	3. Use & users includ-ed	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10.Adequate documentation	11. Dated and signed	12.Pre-shipmt. doc. review
194	√	√	√	√	√	√	√	√	√	√	√	√
558	√	no	√	√	√	√	√	√	√	√	√	no
3416	√	√	√	√	no	√	√	√	√	√	√	√
101	√	√	√	√	√	√	√	√	√	√	√	√
239	√	√	√	√	√	√	√	√	√	√	√	√
154	√	√	√	√	√	√	√	√	√	√	√	√
2346	√	√	√	√	√	√	√	√	√	√	√	√
716	√	√	√	√	√	√	√	√	√	√	√	√
790	√	no	√	√	√	√	√	√	√	√	√	√
224	√	√	√	√	√	√	√	√	√	√	√	√
389	√	no	√	√	√	√	√	√	√	√	√	√
572	√	no	√	√	√	√	√	√	√	√	√	√
533	√	no	√	√	√	√	no	√	√	√	√	√

AQIS issued 30-day compliance letters for all plants with a "no' in their HACCP implementation. (6 establishments)

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

235	√	√	√	√	√	√	√	√	√	√	√	√
007	√	√	√	√	√	√	√	√	√	no	√	√
203	√	√	√	√	√	√	√	√	√	√	√	√
847	√	√	√	√	√	√	√	√	√	√	√	√
654	√	√	√	√	√	√	√	√	√	√	√	√
7170	√	√	√	√	√	√	√	√	√	√	√	√
656	√	no	√	√	√	√	√	√	√	√	√	√
2309	√	no	√	√	√	√	√	√	√	√	√	no
291	no	√	√	√	√	√	√	√	√	√	√	no
3173	√	no	√	√	√	√	√	√	√	√	√	no
612	√	√	√	√	√	√	√	√	√	√	√	no
249	no	√	√	√	√	√	√	√	√	√	√	√
234	√	√	√	√	√	√	√	√	√	√	√	√
100	√	no	√	√	√	√	√	√	√	√	√	√
1980	√	no	√	√	√	√	√	√	√	√	√	√

AQIS issued a 30-day compliance letter for all plants with a “no” in their HACCP implementation. (9 establishments)

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est.3416 which is slaughtering ratites and there is no standard for this species and Est. 389 which is processing only) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
194	√	√	no	√	√	√	√	√	√	√
558	√	no	√	√	√	√	√	√	√	√
3416	ratites	only								
101	√	√	√	√	√	√	√	√	√	√
239	√	√	no	√	√	√	√	√	√	√
154	√	√	no	√	√	√	√	√	√	√
2346	√	no	no	√	√	√	√	√	√	√
716	√	√	no	√	√	√	√	√	√	√
790	√	√	no	√	√	√	√	√	√	√
224	√	no	√	√	√	√	√	√	√	√
389	Processing only									
572	√	no	√	√	√	√	√	√	√	√
533	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit.

Each establishment (except Est. 847, Est. 654 and Est. 100, which are processing only) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

235	√	√	√	√	√	√	√	√	√	√
007	√	no	√	√	√	√	√	√	√	√
203	√	√	√	√	√	√	√	√	√	√
847	Pro-	cessing	only							
654	Pro-	cessing	only							
7170	√	no	no	√	√	√	√	√	√	√
656	√	no	no	√	√	√	√	√	√	√
2309	√	no	√	√	√	√	√	√	√	√
291	√	no	no	√	√	√	√	√	√	√
3173	√	no	no	√	√	√	√	√	√	√
612	√	no	√	√	√	√	√	√	√	√
249	√	√	no	√	√	√	√	√	√	√
234	√	√	no	√	√	√	√	√	√	√
100	Pro-	cessing	only							
1980	√	no	no	√	√	√	√	√	√	√

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment (except Est.3416 which is slaughtering ratites and there is no standard for this species and Est. 389 which is processing only) was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
194	√	√	N/A	√	√	√
558	√	√	N/A	√	√	√
3416	Ratites only					
101	√	√	N/A	√	√	√
239	√	√	N/A	√	√	√
154	√	√	N/A	√	√	√
2346	√	√	N/A	√	√	√
716	√	√	N/A	√	√	√
790	√	√	N/A	√	√	√
224	√	√	N/A	√	√	√
389	Processing	only				
572	√	√	N/A	√	√	√
533	√	√	N/A	√	√	√

Documentation was also audited from the following establishments (except Est. 847, Est. 654 and Est. 100, which are processing only) that were not visited on-site, during the centralized document audit:

235	√	√	N/A	√	√	√
007	√	√	N/A	√	√	√
203	√	√	N/A	√	√	√
847	Processing	only				
654	Processing	only				
7170	√	√	N/A	√	√	√
656	√	√	N/A	√	√	√
2309	√	√	N/A	√	√	√
291	√	√	N/A	√	√	√
3173	√	√	N/A	√	√	√
612	√	√	N/A	√	√	√
249	√	√	N/A	√	√	√
234	√	√	N/A	√	√	√
100	Processing	only				
1980	√	√	N/A	√	√	√